

**UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO, LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON SHEASBY IN SUPPORT OF PLAINTIFF
NETLIST INC.'S MOTION FOR CONSOLIDATION**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Plaintiff Netlist, Inc.’s Motion For Consolidation. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of the complaint in *Micron Technology, Inc., and Micron Semiconductor Products, Inc. v. Netlist, Inc.*, Case No. CV01-23-19920, dated December 11, 2023.

3. Attached as **Exhibit 2** is a true and correct copy of an email thread between Netlist’s counsel and Micron’s counsel, dated October 26, 2023.

4. Attached as **Exhibit 3** is a true and correct copy of an email thread between Netlist’s counsel and Micron’s counsel, dated November 2, 2023

5. Attached as **Exhibit 4** is a true and correct copy of an email from Micron’s counsel, with the subject line “Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) | Micron's Live Witness List,” dated January 17, 2024.

6. Attached as **Exhibit 5** is a true and correct copy Micron’s List of Trial Witnesses, served in this Action on January 29, 2024.

7. Attached as **Exhibit 6** is a true and correct copy of an email from Netlist’s counsel, with the subject line “Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) | Netlist's Live Witness List,” dated January 17, 2024.

8. Attached as **Exhibit 7** is a true and correct copy of Plaintiff Netlist, Inc.’s Trial Witness List (No. 22-cv-294), served in this Action on January 29, 2024.

9. Attached as **Exhibit 8** is a true and correct copy of a webpage titled “Products

Memory Module,” *available at* <https://netlist.com/products/memory-module/>.

10. Attached as **Exhibit 9** is a true and correct copy of Patent Owner’s Request For Director Review in IPR2022-00996, dated January 5, 2024.

11. Attached as **Exhibit 10** is a true and correct copy of Patent Owner’s Request For Director Review in IPR2022-00999, dated January 4, 2024.

12. Attached as **Exhibit 11** is a true and correct excerpted copy of a webpage titled “DDR6 RAM: The Next Big Thing in Memory Technology,” *available at* <https://tecamaze.com/ddr6-ram/>.

13. Attached as **Exhibit 12** is a true and correct excerpted copy of the Petition for *Inter Partes* Review of U.S. Patent No. 11,016,918 in IPR2023-00406, dated January 6, 2023.

14. Attached as **Exhibit 13** is a true and correct excerpted copy of Petitioner’s Reply to Patent Owner’s Response in IPR2023-00996, dated June 20, 2023.

15. Attached as **Exhibit 14** is a true and correct excerpted copy of Petitioner’s Reply to Patent Owner’s Response in IPR2023-00999, dated June 20, 2023.

16. Attached as **Exhibit 15** is a true and correct excerpted copy of the deposition transcript of Scott Cyr, dated November 20, 2023.

17. Attached as **Exhibit 16** is a true and correct copy of an email thread between Netlist’s counsel and Micron’s counsel, dated November 17, 2023.

18. Attached as **Exhibit 17** is a true and correct excerpted copy of the Petitioner’s Reply to Patent Owner’s Response in IPR2022-01428, dated October 19, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 20, 2024.

By /s/ Jason G. Sheasby
Jason G. Sheasby